
UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

UNITED STATES OF AMERICA

v.

MICHAEL ANTHONY RIVERA
and DYLAN JAMES HICKS

ELECTRONIC CRIMINAL COMPLAINT
(Redacted)

CASE NUMBER: MJ-25-04311-PCT-CDB

I, the undersigned, state under oath that the following is true and correct to the best of my knowledge and belief.

COUNT 1

On or about July 20, 2025, in the District of Arizona, in Mohave County, within the confines of the Lake Mead National Recreation Area, an area within the special maritime and territorial jurisdiction of the United States, the defendants, MICHAEL ANTHONY RIVERA and DYLAN JAMES HICKS, by force and violence and by intimidation, did take from the person and presence of A.G.C., a duffel bag containing A.G.C.'s personal property, in violation of Title 18, United States Code, Sections 2, 7, and 2111.

COUNT 2

On or about July 20, 2025, in the District of Arizona, within the confines of the Lake Mead National Recreation Area, an area within the special maritime and territorial jurisdiction of the United States, the defendant, MICHAEL ANTHONY RIVERA, did knowingly brandish, carry, and use a firearm, that is, a Berretta pistol, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, a robbery, in violation of Title 18, United States Code, Section 924(c)(1)(A).

I further state that I am a law enforcement ranger with the National Park Service, and that this Complaint is based on the following facts: **SEE ATTACHED AFFIDAVIT.**

Continued on the attached sheet and made a part hereof:

Yes No

REVIEWED BY: /s AUSA Paul V. Stearns

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X Pursuant to 28 U.S.C. § 1746(2), I declare that the foregoing is true and correct.

Matthew O'Brien, Ranger, NPS

Complainant's Name and Title

MATTHEW O'BRIEN

Digitally signed by MATTHEW O'BRIEN
Date: 2025.07.21 11:04:49 -07'00'

Complainant's Signature

Date

X Sworn by Telephone

Date/Time

Camille D. Bibles, U.S. Magistrate Judge

Name & Title of Judicial Office

Flagstaff, Arizona

City and State

Camille D. Bibles

Digitally signed by
Camille D. Bibles
Date: 2025.07.21
14:26:36 -07'00'

Signature of Judicial Officer

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

ELECTRONICALLY SUBMITTED AFFIDAVIT

I, NPS Ranger Matthew O'Brien, state under oath as follows:

1. Your affiant is employed as a law enforcement ranger with the National Park Service (NPS) and has been so employed since 2021. Your affiant is currently assigned to the Mohave District of Lake Mead National Recreation Area and is charged with the investigation of crimes occurring in (among other places) Lake Mohave. Your affiant's primary duties include the investigation of state and federal crimes committed in the Katherine Landing Area of Lake Mohave, which is within the District of Arizona.

2. The information contained in this affidavit is based upon your affiant's personal knowledge, training, experience, as well as information provided by other law enforcement officers and witnesses including those listed herein. Your affiant has not included every fact known to him concerning this investigation.

Background/Introduction

3. This case involves a robbery that occurred at the Lake Mead National Recreation Area (LMNRA) in the District of Arizona on July 20, 2025. The suspects in this case are Michael Anthony Rivera (Rivera), an 18-year-old male, Dylan James Hicks (Hicks), an 18-year-old male, and E.C.H., a 16-year-old male.

(Hicks and E.C.H. are brothers.) The victim is an 18-year-old male with the initials of A.G.C.

4. In short, and based on the investigation thus far, E.C.H. spit on A.G.C. at Katherine Landing near Cabin Site Cove in the LMNRA. A fight ensued between them, and E.C.H. “won.” Rivera, Hicks, and E.C.H. then went back to their vehicle – a 2005 Chevrolet Silverado that was being driven by Hicks – and Rivera got a Berretta semi-automatic 9mm pistol. Rivera – who was later interviewed by NPS Special Agent Phil Oakes – said that A.G.C.’s group was disrespecting them. Rivera had a holster and pistol in the truck, and he put the pistol in the holster in an appendix carry position. Rivera’s shirt went over the pistol. Rivera, Hicks, and E.C.H. then walked back to A.G.C. and his friend. This was described as a one to two-minute walk. The two groups then exchanged words (i.e., trash talking). Rivera grabbed the front of his shirt and pulled it upward to reveal the Berretta pistol. Hicks (who was also interviewed later by Special Agent Oakes) referred to this as something to the effect of “brandishing” the gun. This terminated the verbal talk by A.G.C. and his friend. According to Hicks, E.C.H. then grabbed a black “shark” backpack – which belonged to A.G.C. – and Rivera, Hicks, and E.C.H. started going back to their truck. While it is somewhat unclear what happened next, it was stated by Hicks that a nearby bystander said something to the effect of you won the fight and you don’t have to do this. This apparently prompted E.C.H. to drop the backpack. According to Rivera and Hicks in their interview with Special Agent

Oakes, they knew the police (rangers) were coming so they started to flee. Hicks was driving, and they all fled. Hicks, however, ran into the rear of a jet ski trailer. A ranger then blocked them in. Rivera then fled the truck on foot toward the lake. As he opened the door, Rivera either threw the Berretta pistol or it fell to the ground. Rivera fled into the lake and was trying to swim away. However, Rivera claims that he got caught in a rope or buoy and could not swim away. Rivera was then apprehended by an NPS ranger. Rivera also said that he had a Ruger revolver with him, and he threw it into a bush as he fled from the ranger after the crash. Both the Berretta and Ruger pistols were recovered by NPS rangers.

5. The bag that was stolen was either thrown into the brush near a dirt path leading to the Cabin Site Cove cliff jumping area, or it was dropped there. A bystander recovered the bag and gave it back to A.G.C. Ranger O'Brien later recovered the bag, and it was found to contain a towel, a speaker system, goggles, and prop (fake) money. A pair of A.G.C.'s sandals were also found in Hicks' truck. However, in their interviews with Special Agent Oakes, both Rivera and Hicks denied knowledge of the sandals.

6. The pistol that Rivera carried in his waistband during the incident, and which he showed (brandished) toward A.G.C., was found to be a Berretta 9 mm APX compact, S/N AXC163972. It had a magazine that had 9 mm rounds in it, but it did not have a round chambered.

7. A second pistol that Rivera possessed when he ran from the rangers, and which was found by a bystander, was found to be a Ruger LCR .38 revolver, S/N 54239259.

8. All three subjects – Rivera, Hicks, and E.C.H. – were taken into custody and brought to the NPS ranger station at Katherine Landing in the LMNRC on the afternoon of July 20, 2025. It was later found that E.C.H. is a juvenile, and he was released to his mother.

9. The LMNRA is an area within the special maritime and territorial jurisdiction of the United States.

Investigation

10. On July 20, 2025, LMNRA Ranger Matthew O'Brien and Ranger Abel Montes responded to a call of six to seven teens fighting at Cabin Site Cove in the LMNRA. Upon arrival, Ranger O'Brien parked his vehicle in the boat ramp area, exited his vehicle, and observed Hicks walking near the restroom.

11. Ranger O'Brien walked towards the launch ramp area where there were three men were walking. Ranger O'Brien contacted the three men from a distance, and one of the men stated that the person Ranger O'Brien was looking for was wearing pineapple shorts. (Hicks was found to be wearing pineapple shorts.) Ranger O'Brien quickly walked towards the parking lot and observed Hicks, Rivera, and E.C.H. in a white Chevrolet pickup truck. Ranger O'Brien shouted something to the effect of “no” and “hey” at the vehicle. The vehicle sped off.

12. Ranger Montes pursued the truck from the north end of the parking lot. While fleeing Ranger O'Brien, Hicks struck a trailer and attempted to drive away. The vehicle came to a complete stop in the upper parking area of Cabin Site Cove, and Rivera exited the passenger side door of the vehicle.

13. Ranger Montes exited the vehicle and ran after Rivera, who had run into the water towards several personal watercrafts (PWC). Ranger Montes called for the owners to deactivate the PWCs using their dead-man switches, and Rivera returned to shore where he was taken into custody by Ranger Montes.

14. Ranger O'Brien had returned to his patrol vehicle and pulled his vehicle behind Ranger Montes. Ranger O'Brien began running towards the water to assist Ranger Montes, but returned to Hicks and E.C.H., who were still seated in the Chevrolet truck.

15. Ranger O'Brien ordered both individuals out of the vehicle. Ranger O'Brien took Hicks into custody. Ranger Tyrel Brant arrived on scene and took E.C.H. into custody.

16. While moving Hicks to his patrol vehicle, Ranger O'Brien found a pistol in the road. Ranger O'Brien asked who it belonged to and if there were any more in the vehicle. Hicks said it was a legal firearm, and that there were no more firearms in the vehicle.

17. Captain Jonathan Jackson arrived on scene and assisted Ranger O'Brien with placing Hicks in the back of his patrol car. Ranger Montes escorted

Rivera to the back of his patrol vehicle. While walking, Rivera stated that the pistol belonged to him.

18. Ranger O'Brien met with A.G.C., who was walking up the road with a white male identified as T.D. A.G.C. had visible injuries to the right side of his face. A.G.C. stated that he was the victim. T.D. stated he was not involved in the fight.

19. A witness, identified as T.P.H., then asked Ranger O'Brien if he found "the gun." Ranger O'Brien asked if anyone had a gun pulled on them. A.G.C. stated that one of the suspects had a gun and was "flashing" a gun. A.G.C. stated that it was "the short one" named Michael who had the gun. Rivera's full name was found to be Michael Anthony Rivera. A.G.C. identified Michael as the male wearing blue shorts and had a tattoo on his chest (which matched Rivera).

20. Ranger Montes walked over and was told by A.G.C. that Rivera had a firearm in his waistband, and that the "fat guy" spit on him. E.C.H. was later identified as the individual who spit on A.G.C. A.G.C. stated that an argument occurred because he called the group "goofy."

21. Ranger O'Brien spoke with T.D., T.P.H., and two other white males who had observed the fight, who were identified as T.K.M. and S.H. T.D., T.P.H., T.K.M., S.H., and A.G.C. were informed that they would need to fill out witness statements.

22. Ranger Montes spoke with A.G.C. According to Ranger Montes, A.G.C. stated that he had encountered Rivera's group several weeks prior. They saw the Rivera's group again today. E.C.H. spit at A.G.C., which resulted in a fight between E.C.H. and A.G.C. E.C.H., Rivera, and Hicks then went to their vehicle. They returned to A.G.C.'s group where Rivera showed a gun that was tucked into his waist. E.C.H. took A.G.C.'s backpack and sandals.

23. Ranger O'Brien arrived and asked A.G.C. to tell his story again. A.G.C. stated that they had encountered Rivera's group several weeks prior, and Rivera's group tried to fight them. A.G.C. informed them that they do not fight, and nothing happened. A.G.C. said that they saw each other again today. A.G.C. referred to Rivera's group as "goofy," and that E.C.H. then spit on him (A.G.C.). According to A.G.C., he and E.C.H. then got into a fight. A.G.C. stated that he hit E.C.H. twice, but E.C.H. hit him (A.G.C.) in the head. A.G.C. said that E.C.H. and his friends (Hicks and Rivera) then walked back to their car, recorded themselves referring to A.G.C. and his friend as "pussies," and Rivera flashed the firearm in his waistband.

24. Ranger O'Brien confirmed with the witnesses that they weren't involved in the fight. Ranger O'Brien then escorted A.G.C. to his patrol vehicle and confirmed that Hicks was not the person he fought.

25. Ranger O'Brien informed Captain Jackson that E.C.H. was the individual who fought A.G.C., Hicks was the driver, and Rivera was the suspect who

had the firearm. A.G.C. told Captain Jackson that he had fought E.C.H., and that Hicks was watching. Ranger O'Brien told Captain Jackson that E.C.H. dropped something in the backseat when he was ordered out of his vehicle. Captain Jackson told Ranger O'Brien that Hicks had been read the Miranda warning. Ranger O'Brien told Captain Jackson that there may be more firearms in the vehicle. A.G.C. then asked if an ambulance was on its way, and Ranger O'Brien told him it was. Ranger Felix Orellana then arrived on scene.

26. Ranger Brant walked over to Ranger O'Brien. Ranger O'Brien told him that A.G.C. saw Rivera's group a few weeks ago. Today (July 20, 2025), E.C.H spit on A.G.C., and they got into a fight after E.C.H. "swung first." A.G.C. said that E.C.H. pushed him and "swung in." Ranger O'Brien said that A.G.C. confirmed that Rivera was the person with the firearm. Ranger O'Brien told Ranger Brant that Rivera's group attempted to take A.G.C.'s bags after the fight. A.G.C. told Ranger Brant that Rivera had a firearm and began taking his bag. A.G.C. clarified that Rivera showed the firearm in his waistband and took his backpack. An unidentified third party walked over, and E.C.H. threw the bag into the bushes.

27. Ranger O'Brien handed all the witnesses a witness statement to fill out. A.G.C. and the witnesses filled out witness statements.

28. S.H. stated they had saw two people fighting. They walked over after the fight and saw one group (believed to be Hicks, Rivera and E.C.H.) leave, then return, and try to take A.G.C.'s backpack.

29. T.K.M. stated that he witnessed the fight from a distance. He walked over after the fight was finished and watched the group (believed to be Hicks, Rivera, and E.C.H.) that was leaving return call the other group names while recording them, and T.K.M. said he observed someone in the group take A.G.C.'s backpack.

30. T.P.H. stated that he saw an altercation from a distance, then witnessed the group (believed to be Hicks, Anthony, and E.C.H.) return and try to steal A.G.C.'s backpack.

31. T.D. stated that he saw E.C.H. start the fight by spitting and then saw Rivera "flashing a gun."

32. A.G.C. stated that he had seen E.C.H., Hicks, and Rivera a couple weeks prior, and the three attempted to fight A.G.C. A.G.C. said that he saw them again today (July 20, 2025) around 4:50 pm. E.C.H.'s group started "talking badly about A.G.C. and his friend. E.C.G. then spit on A.G.C., which caused a fight. Rivera then got a gun and flashed it at A.G.C. and his friend. Ranger Montes was speaking with Rivera at this time. According to Ranger Montes, Rivera said he threw his phone when chased because he didn't want them to get wet. When asked what happened, Rivera stated the verbal argument became physical. When asked if firearms were involved, Rivera stated something to the effect that he pleaded the fifth.

33. Ranger O'Brien spoke with Hicks, who consented to a preliminary breath test using his LifeLoc to determine if there was alcohol in his system at the time of arrest. Hicks registered a .00 BAC.

34. Bullhead City Fire Department arrived and examined both Rivera and A.G.C. A.G.C. was treated for bruising above his right eye and given an ice pack for his wrist. Rivera denied medical evaluation.

35. Ranger Brant interviewed E.C.H. after reading him the Miranda warning. According to Ranger Brant, E.C.H. stated that A.G.C. swung first, E.C.H. dodged a hit, punched A.G.C. 9-10 times, and then spit on him. A.G.C. then fell to the ground.

36. Ranger Brant interviewed A.G.C. According to Ranger Brant, A.G.C. stated that he and his friend went to Cabin Site Cove, and E.C.H. began a verbal altercation. E.C.H. then spit on A.G.C., which led to a physical fight. A.G.C. stated that he hit E.C.H. twice.

37. Ranger O'Brien and Ranger O'Brien spoke with A.G.C. regarding the items in his backpack. A.G.C. opened his bag, which revealed goggles, a speaker, prop (fake) money, and a towel. Ranger O'Brien then escorted A.G.C. to Ranger Brant's vehicle, where A.G.C. confirmed that E.C.H. was the individual who hit him in the face and spit on him. Ranger O'Brien escorted A.G.C. to Ranger Montes's vehicle, where A.G.C. confirmed that Rivera was the individual who flashed the

firearm. Ranger O'Brien then escorted A.G.C. to his patrol car, where A.G.C. confirmed that Hicks was a witness to the fight and was not involved in the fight.

38. Ranger Orellana conducted an inventory of Hicks's truck prior to the arrival of the tow truck. Ranger Montes located a pair of black sandals in the front passenger seat of Hicks's vehicle where Rivera was sitting. A.G.C. confirmed they were his missing sandals. Ranger O'Brien was then given A.G.C.'s backpack as evidence.

39. During the course of the inventory of the truck, Ranger Orellana located a bag with pistol ammunition, a fixed blade knife, a balaclava, and a pistol holster. A visitor informed Captain Jackson and Ranger Montes that they had found an additional firearm where Ranger Montes chased Rivera. Ranger Montes and Captain Jackson retrieved a Ruger LCR .38 revolver, S/N 54239259.

40. Ranger O'Brien transported Hicks to the Katherine Landing Ranger Station. During the ride, Hicks stated that his brother gets him into trouble when looks after him.

41. Ranger O'Brien and Captain Jackson escorted Hicks to the Katherine Landing Information Center to use the restroom. Ranger O'Brien then drove Hicks to the Katherine Landing Ranger Station. Hicks said that he knew about the Beretta pistol, and that it belonged to Michael (Rivera). Hicks said he did not know about the Ruger LCR revolver. Hicks stated that he saw Ranger O'Brien attempt to stop them at Cabin Site Cove and was told by his brother to drive off. Hicks confirmed

that he did see Ranger O'Brien and heard him yell. Hicks stated that E.C.H. and A.G.C. became involved in a fight after A.G.C. called E.C.H. "goofy." E.C.H. then spit on A.G.C., and the two began fighting.

42. On July 20, 2025, to July 21, 2025, NPS Special Agent Phil Oakes met with Hicks and Rivera at the Coconino County Detention Center in Flagstaff, Arizona, after they had been transported there by NPS rangers. Special Agent Oakes re-read both suspects the Miranda warning. Both subjects agreed to speak with Special Agent Oakes. The following is a brief summary of those interviews (as provided by Special Agent Oakes).

43. Hicks interview:

- Hicks, Rivera, and E.C.H. went to Katherine Landing.
- They met two males they had seen there before.
- E.C.H. got into a verbal and physical altercation.
- The three of them went to Hick's vehicle where Rivera retrieved a Beretta handgun.
- They returned to the two males and had another verbal altercation.
- RIVERA then "brandished" the handgun that he had in his front waistband.
- E.C.H. then took a black backpack that had a shark mouth on it.

- They started walking toward the truck when a bystander confronted them. E.C.H. dropped the backpack.
- They got into Hick's truck to leave and saw the police coming.
- EC.H. and Rivera yelled at Hicks to drive, Hicks accelerated and hit a jet ski trailer.
- Hicks stopped after a ranger vehicle pulled in front of him.
- Rivera exited the vehicle and started to run.
- Hicks knew there was .38 caliber ammunition in his car but did not see a revolver.

44. Rivera's interview:

- Rivera, Hicks, and E.C.H. went to Katherine Landing.
- They met two males they saw there approximately two weeks ago.
- They all started talking and then egos became involved
- A physical fight started between E.C.H. and one of the males.
- After the fight, more verbal altercation continued.
- Rivera felt disrespected and went to Hicks' truck to retrieve his Beretta handgun.
- Rivera went back to the two males, and they continued to exchange words.

- Rivera pulled up the front of his shirt exposing the Beretta, which stopped the argument.
- Rivera, Hicks, and E.C.H. started walking toward the truck.
- A bystander said something to the three of them, but Rivera didn't really engage.
- They got back to the truck and saw the police coming, so they tried to drive away.
- They hit a jet ski trailer.
- Rivera said he got nervous, opened the passenger door, and the Beretta fell to the ground.
- Rivera said he started running down a hill. He threw the Ruger revolver into a bush with hopes of retrieving it at a later time.
- Rivera then jumped into the water and got tangled in a white rope.

45. Ranger O'Brien, Ranger Brant, Ranger Montes, and Sgt. Thomas Thorne interviewed E.C.H. in the presence of his mother, J.K.H., at the Katherine Landing Ranger Station. E.C.H. was read his Miranda Warning and agreed to talk. E.C.H. stated that he got into a verbal altercation with A.G.C. because A.G.C. called him "goofy." E.C.H. stated that A.G.C. threw the first punch, and E.C.H. spit on A.G.C. while he was on the ground. E.C.H. stated that he was aware of the Beretta

pistol in the car and had handled it when Rivera showed it to him. E.C.H. said that he was unaware of any additional firearms. E.C.H. stated that he took A.G.C.'s backpack and tossed it 10 to 15 feet away from where A.G.C. was located. E.C.H. said that he did not know who took A.G.C.'s sandals. E.C.H. stated he was unaware that Hicks hit another vehicle. E.C.H. stated that they were trying to flee because he was scared. When he was ordered to exit the vehicle, E.C.H. stated that he leaned forward to grab his vape tobacco.

46. Ranger O'Brien asked E.C.H. multiple times about why they fled the parking lot at a high speed, and E.C.H. stated that he did not see any law enforcement and did not encourage his brother to drive away. E.C.H. then changed his story and stated that he saw Ranger O'Brien in the parking lot and encouraged his brother to drive away.

47. Sgt. Thorne asked E.C.H. about the Beretta pistol, and E.C.H. stated that Rivera grabbed it from a holster under his seat. E.C.H. stated he did not see Rivera put the firearm in the vehicle. E.C.H. stated that he did not know of the ammunition in the vehicle. E.C.H. stated that Rivera had multiple firearms and had purchased the Beretta off of Facebook. E.C.H. was then released to his mother, J.K.H.

Conclusion

48. Based on the foregoing, your affiant submits that there is probable cause to believe that the defendants, Michael Anthony Rivera and Dylan James

Hicks, violated federal law under 18 U.S.C. §§ 2 and 2111 (robbery). Furthermore, that Rivera violated 18 U.S.C. § 924(c) by carrying, using, and brandishing a firearm during the commission of crime of violence (i.e., a robbery).

Pursuant to 28 U.S.C. § 1746(2), I declare under penalty of perjury that the foregoing is true and correct.

Executed on: July 21, 2025

MATTHEW O'BRIEN

Digitally signed by MATTHEW O'BRIEN
Date: 2025.07.21 11:03:36 -07'00'

Matthew O'Brien, NPS, Ranger

X Sworn by Telephone

Date/Time: _____

Camille D.
Bibles

Digitally signed by Camille
D. Bibles

Date: 2025.07.21 14:26:12
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Camille D. Bibles
United States Magistrate Judge